

EXHIBIT C

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF DESIRET CARVACHE

I, Desiret Carvache, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based upon my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present in New York City when the terrorist attacks of the World Trade Center (“WTC”) Towers occurred. At the time of these horrific attacks, I worked as a Financial Manager at the Citigroup Corporation located at 5 WTC. Attached as Exhibit B to this Declaration is a true and correct copy of my proof of employment at the Citigroup Corporation at the time of these terrorist attacks.

4. On the morning of 9/11, I was on the third floor of 5 WTC when I learned that the North Tower had been struck by a passenger jet and that a fire had erupted in the building. I immediately decided to evacuate my office building by going down the escalator.

5. As I stepped off of the descending escalator, I saw a woman on the level above who had been struck by falling building debris. She asked for help, and she appeared to be in shock. I

started back up the escalator towards her, but I tripped and fell on the metal part of the escalator steps and I injured both of my knees. While bleeding from my knees, I approached the woman to help her escape the area.

6. As the woman and I exited the building, we were immediately struck by building debris, and I injured my back, neck, and the right side of my midsection. I encountered a large cloud of dust and building debris as I tried to escape to safety, and I saw people being struck by debris and trampled while trying to find safety. The scene outside of 5 WTC looked like a war zone and it will live in my memory forever.

7. As I attempted to escape from the area, the ground began trembling. A powerful cloud of hot air rushed by me and blew me off of my feet and towards a fire hydrant. I slammed into the concrete and I felt significant pain in the area of my stomach again. As I stumbled back to my feet, I could not see due to the massive cloud of dust that surrounded me. I twisted my ankle on a sewer grate and I fell to my knees. Another piece of debris struck me in the head and the impact removed a chunk of my hair. I felt a snap in my neck and I inhaled large quantities of dust and debris into my lungs and airways. I passed out while choking on the dust and debris, and I later woke up in New Jersey at the Christ City Hospital. I do not know how I arrived at the hospital.

8. As a result of these terrorist attacks, I suffered the following specific injuries on September 11, 2001: right and left knee sprains¹; a left ankle injury²; a neck injury³; a back injury⁴ with bulging cervical discs; headaches⁵; a hernia⁶; serious ingestion and inhalation injuries due to

¹ See, Medical Records of Desiret Carvache (CARVACHE_MEDS_000001), attached hereto as Exhibit C, at 0002, 0004, 0006-0007, 0009, 0011, 0019, 0021, 0024, 0027, and 0031.

² *Id.* at 0002, 0004, 0006-0007, 0009, and 0019-0020.

³ *Id.* at 0004, 0011, 0018, 0027, 0031, and 0037-0040.

⁴ *Id.* at 0002, 0004, 0006-0007, 0011, 0016, 0018-0020, 0024, 0027, 0030-0031, and 0035-0036.

⁵ *Id.* at 0019.

⁶ *Id.* at 0011-0015, 0027 and 0031.

the large quantities of debris and toxins that I inhaled, including chronic rhinitis⁷, asthma⁸, an upper respiratory disease⁹, obstructive airway disease¹⁰, and gastroesophageal reflux disease¹¹; septal deviation¹²; and lastly, chronic sinusitis¹³. Lastly, I have been diagnosed with post-traumatic stress disorder¹⁴ due to the horrific events that I witnessed on 9/11.

9. I sought and continue to seek medical attention on a monthly basis for my injuries caused by these terrorist attacks. Attached as Exhibit C to this Declaration is a true and correct copy of my select relevant medical records related to the treatment that I received for my physical and emotional injuries following the September 11, 2001 terrorist attacks.

10. I previously pursued claims (Claim Number 0107403) through the September 11th Victim Compensation Fund specifically related to my physical injuries incurred on September 11, 2001, and my claims were determined to be eligible for compensation.

I DECLARE, VERIFY AND STATE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 15 day of February 2022.


Declarant Desiret Carvache

⁷ *Id.* at 0002 and 0004.

⁸ *Id.* at 0002, 0004, 0022, 0024, 0027, 0030, and 0032.

⁹ *Id.* at 0001, 0006-0010, 0024, and 0030.

¹⁰ *Id.* at 0001 and 0032.

¹¹ *Id.* at 0001-0002, 0004, 0019, 0021, 0026, and 0030-0032.

¹² *Id.* at 0029-0030, 0032, and 0034.

¹³ *Id.* at 0019, 0022, 0026-0027, 0029-0030, and 0032-0034.

¹⁴ *Id.* at 0001-0002, 0004, 0011, 0017-0019, 0021, 0024, 0026-0028, and 0030-0032.

**EXHIBITS
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